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ABSTRACT

Findings of an audit of the New York State Education Department's procedures to maintain security over Pupil Evaluation Program (PEP) and Program Evaluation Test (PET) examination materials are presented in this report. The audit sought to determine whether the department's security procedures adequately prevented unauthorized access to exam materials and answer keys and whether local schools complied with the procedures. Methodology involved document analysis, interviews with department staff and responsible school officials, and observations at 181 schools and regional distribution centers for the period April 1, 1990, through May 31, 1991. Findings indicate that local school administrators failed to comply with department security procedures at 63 locations, or 35 percent of the total. Serious violations included improperly opened examinations and answer keys, early distribution to teachers, improperly stored tests, administration to students on the wrong dates, and failure to take initial inventories. District-level violations included the failure to seal all examination materials and inadequate control of printing and distribution centers. Two figures are included. Appendices contain comments of State Education Department officials and a list of the 63 schools and observed violations. (LMI)

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State of New York
Office of the State Comptroller
Division of Management Audit

STATE EDUCATION DEPARTMENT

SECURITY OVER PUPIL EVALUATION PROGRAM AND PROGRAM EVALUATION TEST MATERIALS NEEDS IMPROVEMENT

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REPORT 91-S-2

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Edward V. Regan
Comptroller

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EDWARD V. REGAN
COMPTROLLER

DIVISION OF
MANAGEMENT AUDIT
AND FINANCIAL REPORTING

The Honorable Martin C. Barell
Chancellor
New York State Board of Regents
State Education Building
Albany, NY 12234

Re: Report 91-S-2

Dear Chancellor Barell:

Pursuant to the State Comptroller's Authority as set forth in Section 1, Article V of the State Constitution and Section 8, Article 2 of the State Finance Law, we audited the State Education Department's procedures to maintain security over Pupil Evaluation Program and Program Evaluation Test examination materials for the period April 1, 1990 through May 31, 1990. Our performance audit included an evaluation of Department procedures for developing, printing and distributing the examinations and for ensuring adequate security at the local school level. Our objective was to determine whether the Department established adequate security procedures to prevent unauthorized access to examination materials and answer keys and whether local schools complied with the procedures. To accomplish our objective, we reviewed the procedures for securing examinations, interviewed Department staff and school officials responsible for test security, and visited 181 schools statewide to observe security procedures and count examinations on hand.

We conducted our audit in accordance with generally accepted government auditing standards. Such standards require that we plan and perform our audit to adequately assess those operations which are within our audit scope. Further, these standards require that we review the Department's system of internal controls and its compliance with those laws, rules and regulations that are relevant to the operations which are included in our audit scope. An audit includes examining, on a test basis, evidence supporting transactions recorded in the accounting and operating records and applying such other auditing procedures as we consider necessary in the circumstances. An audit also includes assessing the estimates, judgments, and decisions made by management. We believe that our audit provides a reasonable basis for our findings, conclusions and recommendations.

Our audit identified significant instances of noncompliance with the Department's security guidelines at the local school level, which could have a material effect on the integrity of the examination process. These matters are discussed in the section of this report entitled "Security Procedures at the Schools and Regional Distribution Centers Need Substantial Improvement." In addition, we noted certain other matters involving the

security of examination materials in the Department's possession that should be addressed by Department management. These matters are discussed in the section of this report entitled "Department Security Procedures Can Be Strengthened."

Office of the State Comptroller
Division of Management Audit

December 7, 1990

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STATE EDUCATION DEPARTMENT
SECURITY OVER PUPIL EVALUATION PROGRAM AND
PROGRAM EVALUATION TEST MATERIALS NEEDS IMPROVEMENT

INTRODUCTION

BACKGROUND

The State Education Department (Department) through its Division of Educational Testing (Division) uses the Pupil Evaluation Program (PEP) tests and the Program Evaluation Tests (PET) for a variety of purposes designed to strengthen elementary and middle school instruction in areas of reading comprehension, mathematics, science, social studies and writing. The Division develops, prints and distributes these tests to public and non-public elementary and middle schools, which directly administer them.

The PEP tests consist of achievement tests in the basic skill areas of reading, writing, and mathematics. Schools use the PEP tests to identify students who need special help in developing these basic skills. The reading and mathematics tests are administered to students in the third and sixth grades; the writing test is administered to students in grade 5. The PEP tests are given annually in May, on dates designated by the Division. In 1990, the tests were given the week of May 7 through May 11.

The Division has established a State Reference Point, which is used to assess student performance on the PEP tests. Schools must provide remedial instruction to students scoring below the State Reference Point on any of the PEP exams. Schools also use PEP test scores to identify students who should be evaluated for possible handicapping conditions which may adversely affect their development.

The PET tests consist of achievement tests in science and social studies. The science test is administered annually to students in the fourth grade; the social studies tests are administered annually to students in the sixth and eighth grades. The Division instructs schools to give the PET tests in late May, to allow students to cover as much of the curriculum as possible before being tested. However, the specific dates are determined by the schools.

The Division designed the grade 4 science PET tests to measure the effectiveness of elementary school science programs. Similarly, the PET tests in social studies are designed to measure the effectiveness of elementary and middle school social studies programs. The PET test results provide the Department and the schools with information that can be used in the planning, management and evaluation of educational programs at the State and local levels. Unlike the PEP tests, the Division does not set a State Reference Point for PET tests and schools are not required to provide remedial instruction to students who achieve low scores.

The Department publishes the PEP and PET test results for each school and school district in its Comprehensive Assessment Report, to provide a public record of school

effectiveness and to stimulate public dialogue that may lead to school improvement. To allow for meaningful evaluations and comparisons of schools' educational programs, the PEP and PET test results must be valid. (A national study released in September 1989 by Friends for Education, an educational watchdog group headquartered in New Mexico, contends that some educators, desperate to demonstrate excellence, are routinely helping students cheat on exams. Examples cited include teachers and principals coaching students on test questions, allowing more than the allotted time to finish test questions, and altering answer sheets and grade reports.) In this regard, the Division has implemented security procedures for developing, producing, shipping and storing exam materials, to preclude early, unauthorized access to PEP and PET exam materials that would invalidate their results. These security procedures relate to operations within the Department and at the schools.

Our recent audit of security over Regents examinations (Report 90-S-99) concluded that security procedures have improved, but significant weaknesses still exist in some of the high schools that administer the examinations. The audit found security weaknesses at 32 of the 141 high schools visited during the January 1990 testing period. At 16 high schools, the security violations were serious enough to jeopardize the integrity of the examinations. On the basis of these findings, we determined that an audit of security procedures over PEP and PET examinations, which are generally given in elementary schools, was warranted.

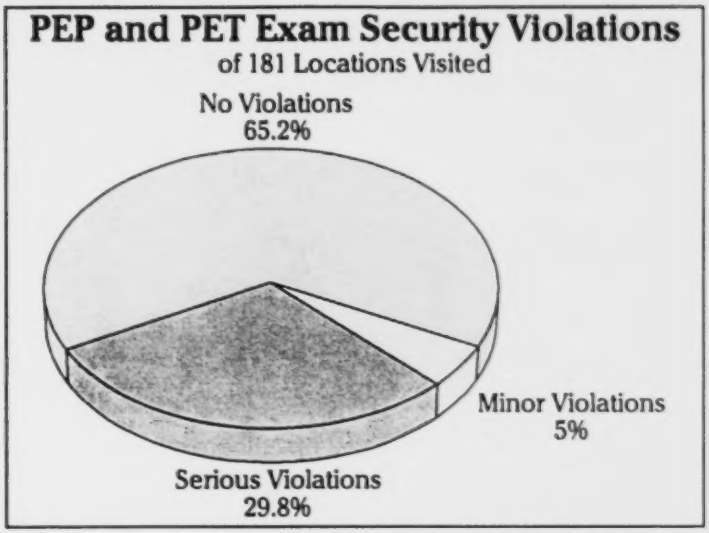
OBJECTIVES, SCOPE AND METHODOLOGY

We audited the Department's policies and procedures for security over PEP and PET tests for the period April 1, 1990 through May 31, 1990. The objectives of our audit were to determine whether the Department's security procedures were adequate to prevent unauthorized access to examination questions and answer keys and whether the schools were following these procedures. Our performance audit was conducted in accordance with generally accepted government auditing standards and, accordingly, included such tests of the records as we considered necessary in the circumstances. We examined documentation supporting the number of examinations distributed by the Division and the New York City Board of Education. Additionally, we visited a judgmentally selected sample of 181 schools and regional distribution centers to assess security and accountability practices over examination materials. We also interviewed responsible officials at the Department, the New York City Board of Education, the private shipping firm and the schools we visited.

SUMMARY OF FINDINGS

Our audit indicates that there are enough breaches in security over PEP and PET examinations at the local schools to warrant an increased level of Department oversight during test administration periods. We visited 181 schools and regional distribution centers during the May 1990 testing period and found local school administrators were not complying with the Division's security procedures at 63 locations (35 percent). A complete listing of these 63 schools is presented as Exhibit A to this report. At 54 of these locations, the security violations were serious enough to jeopardize the integrity of examinations by enabling students and/or teachers to gain advance knowledge of questions and answers. These serious violations include improperly opened examinations and answer keys,

examination materials distributed to teachers prior to the day of the exam or otherwise not stored in a secure location, and examinations administered to students on the wrong dates.



Further, the Division needs to strengthen its security procedures over examination materials by sealing all of the examination questions and answer keys it sends to schools and by implementing enhanced security procedures for examination materials on hand in its printing and distribution units. We identified similar weaknesses in our previous audit of Regents examination security.

COMMENTS OF AGENCY OFFICIALS

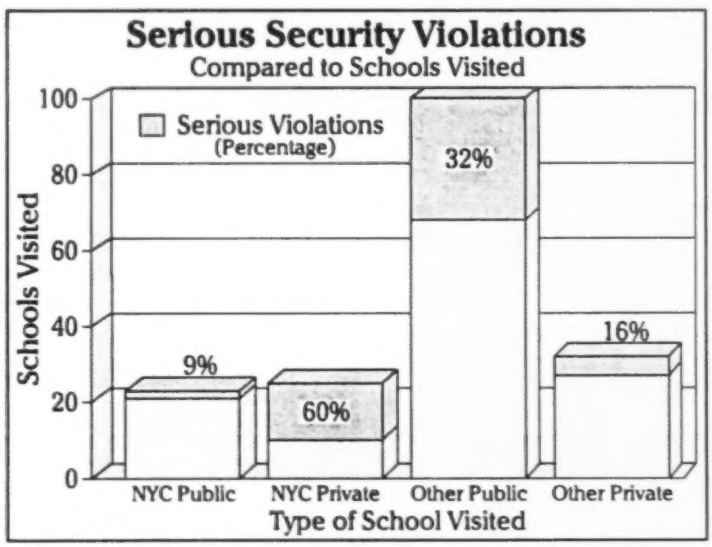
Draft copies of this report were provided to Department officials for their review and comment. Their comments have been considered in preparing this report. Department officials agree with our recommendations and plan to implement them to the extent staffing allows. A copy of the Department's response is attached as Appendix A.

Within 90 days after final release of this report, as required by Section 170 of the Executive Law, the Chancellor of the New York State Board of Regents shall report to the Governor, the State Comptroller and the leaders of the Legislature and Fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons therefor.

SECURITY PROCEDURES AT THE SCHOOLS AND REGIONAL DISTRIBUTION CENTERS NEED SUBSTANTIAL IMPROVEMENT

We reviewed examination security procedures at 177 schools and 4 regional distribution centers across the State and found violations at 63 (35 percent) of the locations. As shown in Exhibit A, the types of violations we identified can be grouped into four categories: 1) examination materials opened prior to the approved date; 2) examination materials not properly secured; 3) examinations given ahead of schedule; and 4) examination materials not inventoried upon receipt. We consider the first three categories of security violations to be serious. We found one or more of these serious violations at 54 of the 181 locations visited. For example, officials at St. Bernard School in Manhattan had opened sealed examination materials early, did not store examination materials in a secure location, could not account for all examinations, and had administered one test two days prior to the scheduled date. We identified similar combinations of serious security violations at 53 other schools.

Based on these findings, we believe that the Department must take additional steps to ensure that school officials follow established security procedures for receiving and storing examination materials and for administering examinations. For example, staff should make unannounced visits to schools throughout the State during examination periods to evaluate compliance with security procedures. The New York City Board of Education makes such visits to the public schools under its jurisdiction to check security over its own examinations as well as PEP and PET exams. Because New York City public school officials are aware that these visits may occur, they appear to have made a concerted effort to comply with the Division's examination security procedures. This was evident from our visits to 23 New York City public schools, during which we found serious security violations at only 2 schools (9 percent). As the following chart illustrates, New York City public schools had a better compliance rate than public schools outside of New York City and a better compliance rate than private schools both in New York City and elsewhere.



Also, although Division staff instruct school officials in proper security procedures in a number of ways, officials at schools which had serious security problems frequently stated that they were unaware of the particular security requirements. To help reinforce security requirements, Division management should include a written summary of

the Department's security procedures with each shipment of examination materials. Additionally, Division management should consider providing remedial training to officials at those schools where violations are noted.

EXAMINATION MATERIALS WERE IMPROPERLY OPENED

Division procedures prohibit school officials from opening sealed examination materials (examination questions and answer keys) until the scheduled day of the examination. Complying with these procedures is crucial to the integrity of the examination process. Nevertheless, school officials at 51 of the 181 locations we visited (28 percent) opened, and in some cases distributed, examination materials before they should have. Following are examples of these violations.

- At the Fairfield Elementary School in Massapequa, Long Island, school officials opened the sealed bundles of examination questions and answer keys for the grades 3 and 6 PEP mathematics tests and Part II of the grade 5 PEP writing test up to three days before the scheduled dates of the examinations and distributed them to the teachers. We notified the Division of this violation and arrangements were made to remove the examinations from the school.

- At the Bais Rachel School in Boro Park, Brooklyn, the school principal and staff opened all PEP and PET bundled examination questions and answer keys shortly after receipt. Open examination materials were on hand for as long as two weeks prior to the scheduled dates of the examinations.

- At School 16 in Albany, school officials removed the shrink-wrap plastic from all bundles of PET examination materials at least four days before the examinations were to be given. We notified the Division of the security violation and the examination materials were removed from the school.

- At the Brincherhoff Elementary School in Fishkill, school officials opened sealed PEP examination question and answer key bundles up to four days before the scheduled dates of examination.

STORAGE PROCEDURES WERE NOT ADEQUATE

Division procedures require that PEP examination materials be stored, until the date administered, in a vault, safe or other secure location approved by Division management. Schools which do not have an acceptable, secure location are directed to make other arrangements, such as using appropriate facilities at a nearby school or bank. Although the Division does not require that PET examination materials be stored in a safe or a vault, these materials must be stored in a secure location. However, we found that school officials at 24 of the 181 locations we visited (13 percent) did not store examination materials in a secure location, including 13 schools where examination materials were in the possession of teachers prior to the day of the examination. Following are examples of these violations.

- At one school, Thomas K. Beecher of Elmira, PEP examination questions and answer keys were distributed to teachers prior to the scheduled days for these

tests. We found that the examination materials in the possession of teachers were not sealed; we also could not account for all answer keys. Further, in one classroom, a substitute teacher did not know where the regular teacher kept the examination materials; however one of the students readily pointed out the location.

- At the Andrew T. Morrow School in Central Islip, Long Island, examination materials were kept in several unsecured locations including the principal's office, a conference room and teachers' rooms. School officials had also opened examination question bundles prior to the dates the tests were to be given.

- At the Buffalo Academy for the Visual and Performing Arts, PEP examination materials were inappropriately stored in teachers' classrooms at the time of our visit, although a locking vault was available.

TESTS WERE NOT GIVEN ON THE SCHEDULED DATES

Division management dictates specific dates for annually administering the PEP examinations. During our visits, we identified five schools which gave at least one PEP examination before the scheduled date. For example, at the St. Catherine of Siena School in Manhattan, school officials gave one examination (PEP grade 6 math) two days earlier than scheduled. Another school (A. Fantis Parochial School in Brooklyn) gave part of the PET grade 4 science test in April, although the Department calls for these tests to be given in May. Administering examinations before the scheduled date (especially PEP tests) violates security procedures and greatly increases the risk that administrators and students at schools which have not yet given the examinations may obtain them.

INITIAL INVENTORIES OF EXAMINATIONS ARE NOT ALWAYS TAKEN

The Division requires school officials and regional distribution center employees to count examinations as soon as possible after receipt, to ensure that all materials listed on the shipping manifests are in the boxes and that examinations have not been compromised prior to arrival. Nonetheless, we found that 14 schools did not properly inventory examination materials upon receipt. Officials at one school could not complete an inventory because the shipping invoice was not included in the box with the examination materials. At two other schools, officials completed the inventory several days after receipt, but offered no explanation for not completing it earlier. At the remaining 11 schools, officials simply neglected to inventory the examination materials.

RECOMMENDATION

Take additional steps to ensure that school officials follow proper examination security procedures. Such steps should include, but not be limited to:

- making unannounced visits to schools to verify compliance with examination security procedures.

- including a summary of Departmental security procedures with each examination shipment.
- providing remedial training to officials at schools with security violations.

DEPARTMENT SECURITY PROCEDURES CAN BE STRENGTHENED

Division managers are responsible for developing security procedures to safeguard examinations from the time they are developed until they are administered by the local schools. These procedures include sealing examination questions and answer keys in clear plastic wrap, to deter unauthorized access and alert school officials to tampering. However, the Division does not seal all examination questions and answer keys, which may permit unauthorized access to occur and go undetected.

NOT ALL EXAMINATION MATERIALS SENT TO SCHOOLS ARE SEALED

The Division seals its PEP and PET English-language, regular-type examinations and PEP examination answer keys in shrink-wrap plastic before shipping them to the schools. The Division instructs school administrators to not open the sealed bundles until the scheduled day of each examination. Thus, the shrink-wrap plastic, if left intact, precludes advance viewing of examination materials and protects the integrity of the test content. Also, open or missing shrink-wrap would alert school officials or others checking the examinations to possible tampering.

We found, however, that the Division does not seal the large-type versions of its PEP and PET examinations, nor does it seal the alternate language (Spanish, French, Chinese and Haitian-Creole) versions. These examinations are sent to the schools loose within the shipping cartons. Except for either having larger printing for vision-impaired students or being translated into a foreign language, these versions of the PEP and PET examinations are the same as the sealed exams; that is, they contain the same questions and answers. Thus, the security gained by sealed regular-type examinations is lost at schools that order the large-type or alternate language examinations. Once such examinations are sent to the schools, school officials have access to the examination questions without having to open any of the sealed bundles. Also, unauthorized access to these examination materials by students, teachers or others could go undetected.

During our school visits, we found that seven school administrators ordered large-type examinations even though they did not have students who required them. The principal of Hoosick Falls Elementary School ordered one large-type version of every PEP and PET examination. Yet, the school did not have a vision-impaired student in each grade covered by the examinations. The administrator told us that the school district had one visually-impaired student in seventh grade, who may need to be tested with these examinations based on his Individual Education Plan. At the other schools, the administrators ordered large-type versions of one or more PEP and PET examinations, although the schools had no visually-impaired students. The school administrators stated that the examinations were ordered in the event they were needed. At four schools we visited, school district officials ordered large-type versions of every exam required. Three of the schools, Elm Street and Lincoln Street Elementary Schools in Waverly and Chemung Elementary School in Chemung, had no visually-impaired students.

Additionally, we found that the Division does not seal the PET answer keys, as it does for the PEP exams. As a result, unauthorized access to the answer keys could also go undetected.

IMPROVED CONTROL IS NEEDED OVER EXAMINATIONS IN THE PRINTING AND DISTRIBUTION UNITS

In our previous audit of Regents examination security, we identified weaknesses in security over examinations in the Division's printing and test distribution units and made recommendations to management concerning these matters. In general, the prior audit found that there was a lack of precise accountability over the number of examinations printed and warehoused in the Albany offices. As a result, the Division could not identify the exact number of examinations on hand at any point in time. Since employees in both units had access to loose examinations, Division managers could not be completely assured that examinations had not been improperly removed from the premises. To improve security over all examination materials, the audit recommended that Division management consider establishing precise accountability over the number of examinations printed, discontinue transferring loose examinations to the distribution unit, and require distribution staff to accept responsibility in writing for the actual number of examinations received.

During our current audit, we assessed security in the printing and test distribution units over PEP and PET examinations. In general, we determined that Division management had not implemented our prior audit recommendations concerning Regents examinations and that security over PEP and PET examinations suffered from the same weaknesses. In this regard, Department management believes that it is cost prohibitive and impractical to establish precise accountability over all examinations (three million or more according to Department officials) in the printing and test distribution units. However, management agrees to seal all examinations before they are transferred from the printing unit to the test distribution unit. This step, coupled with existing physical security measures, should reduce the risk that examinations could be improperly removed from the Division's offices.

RECOMMENDATION

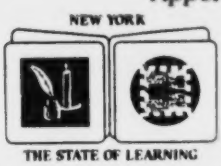
Seal all PEP and PET examinations, including large-type and alternate language examinations, and the related answer keys before transferring them from the printing unit to the test distribution unit.

Exhibit A

State Education Department PEP & PET Exam Security Violations Observed May 1990				
School Name – Location	Type of Security Violation			
	Improperly Opened Exam Materials	Improper Storage Procedures	Tests Not Given on Scheduled Days	Inventories of Exams Not Taken
School 27 – Albany		•		•
Holy Cross School – Albany	•	•		
School 16 – Albany	•			
Phillip Schuyler Elementary School – Albany	•			
Cathedral Academy – Albany	•	•		
Lake Ave. School – Saratoga Springs	•			
Saratoga Warren BOCES – Saratoga Springs	•			
Citizen Edmond Genet School – East Greenbush	•	•		
Donald P. Sutherland School – Nassau	•	•		
Green Meadow School – Castleton	•	•		
Bell Top School – Troy	•	•		
Hoosick Falls Elementary School – Hoosick Falls	•			
Rensselaer Park Elementary School – Troy	•			
St. Mary's Academy – Hoosick Falls				•
Tamarac Middle School – Troy				•
George Washington School – Troy				•
St. Paul School – Manhattan	•			
The Lenox School – Manhattan	•	•		
St. Catherine of Siena School – Manhattan	•	•	•	
Park East Eshi Day School – Manhattan				•
St. Bernard School – Manhattan	•	•	•	
Holy Cross School – Manhattan	•			
Sacred Heart of Jesus School – Manhattan	•			
Birch Wathen School – Manhattan	•		•	
Bais Yaakov of Brooklyn – Brooklyn	•		•	

State Education Department PEP & PET Exam Security Violations Observed May 1990				
School Name - Location	Type of Security Violation			
	Improperly Opened Exam Materials	Improper Storage Procedures	Tests Not Given on Scheduled Days	Inventories of Exams Not Taken
Bais Rachel School - Boro Park - Brooklyn	•		•	
St. Frances de Chantal School - Brooklyn	•	•		•
PS 39 - Brooklyn		•		
St. Saviour Elementary School - Brooklyn	•	•		
A. Fantis Parochial School - Brooklyn			•	•
Brooklyn Friends School - Brooklyn	•			
PS 167 - Brooklyn	•			
Santa Maria School - Bronx	•	•		
Our Lady of the Angelus School - Rego Park	•			
Fairfield Elementary School - Massapequa	•	•		
Hawthorn Elementary School - Massapequa Park	•	•		
Lockhart Elementary School - Massapequa	•			
St. Ladislaus School - Hempstead	•			
St. Thomas the Apostle School - West Hempstead	•			
Southdown Elementary School - Huntington				•
Huntington Elementary School - Huntington Sta.				•
Jefferson School - Huntington				•
Christ the King School - Commack	•			
Burr Intermediate School - Commack	•			•
Sawmill Intermediate School - Commack	•	•		
Andrew T. Morrow School - Central Islip	•	•		•
Chenango Bridge Elementary School - Binghamton	•			
McKinley - Brighton Magnet Elementary School - Syracuse	•			
Albany School - Utica	•			
Christopher Columbus School - Utica	•	•		

State Education Department PEP & PET Exam Security Violations Observed May 1990				
School Name - Location	Type of Security Violation			
	Improperly Opened Exam Materials	Improper Storage Procedures	Tests Not Given on Scheduled Days	Inventories of Exams Not Taken
John F. Hughes School - Utica	•			
Thomas K. Beecher School - Elmira	•	•		
Buffalo Academy for Visual and Performing Arts - Buffalo	•	•		
Thomas A. Edison Elementary School - Tonawanda	•			
Charles B. Gaskill Middle School - Niagara Falls	•			
Harry F. Abate Elementary School - Niagara Falls	•	•		
Seventy Ninth Street School - Niagara Falls	•			
Geraldine J. Mann School - Niagara Falls	•			
Brinckerhoff Elementary School - Fishkill	•	•		
St. John the Evangelist School - Beacon				•
Gov. George Clinton School - Poughkeepsie	•	•		
Violet Avenue School - Poughkeepsie	•			
Duzine School - New Paltz				•
Total	51	24	6	14



THE STATE EDUCATION DEPARTMENT THE UNIVERSITY OF THE STATE OF NEW YORK/ALBANY NY 12234

EXECUTIVE DEPUTY COMMISSIONER OF EDUCATION
THE NEW YORK STATE EDUCATION DEPARTMENT
ALBANY, NEW YORK 12234

October 30, 1990

Mr. Roland M. Malan
Assistant Deputy Comptroller
Division of Management Audit and
Financial Reporting
Office of the State Comptroller
Albany, New York 12236

Dear Mr. Malan:

Thank you for the draft audit report (No. 91-S-2) resulting from an audit of the State Education Department's procedures to maintain security over Pupil Evaluation Program and Program Evaluation Test examination materials. The Department's response to the audit is enclosed.

Sincerely,

Thomas E. Sheldon

Enclosure

cc: Richard Sauer
Ronald Saffin

The University of the State of New York
THE STATE EDUCATION DEPARTMENT
Albany, New York 12234

Response of the State Education Department to the Audit Findings on the Security of Pupil Evaluation Program Tests and Program Evaluation Tests

October 1990

The audit finding related to the security of the Pupil Evaluation Program Tests and the Program Evaluation Tests is concerned with security in the schools.

The Department's response to the audit finding focuses on the recommendations given in the report.

"Take additional steps to ensure that school officials follow proper examination security procedures. Such steps should include, but not be limited to:

- Making unannounced visits to schools to verify compliance with examination security procedures
- Including a summary of Departmental security procedures with each examination shipment
- Providing remedial training to officials at schools with security violations."

A summary of Departmental security procedures will be included with each examination shipment. The extent to which the other two recommendations will be implemented depends upon the availability of staff given the other demands placed upon them.

"Seal all PEP and PET examinations, including large-type and alternate language examinations, and the related answer keys before transferring them from the printing unit to the Test Distribution Unit."

This recommendation will be implemented.